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June 29, 2005

By Courier and E-File

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd floor
Boston, MA 02202

Re: Bay State Gas Company, D.T.E. 05-27

Dear Ms. Cottrell:

On June 24, 2005, the Attorney General submitted a letter seeking to supplement his Motion for Depositions by identifying the names of certain Bay State employees whose depositions he wishes to take.

Bay State objects to this supplement to the Attorney General's Motion for Depositions for the reasons contained in Bay State's Opposition filed June 9, 2005 to the Attorney General's Motion.

In addition, it appears that solely as a result of their names being present in various documents that were submitted as part of discovery, the Attorney General seeks to take the depositions of Bay State employees, Keith Dalton and John Nerden, and NiSource Corporate Services employee, Edward Collins, based on his belief that these individuals should have information regarding corrosion in the Company's distribution system.

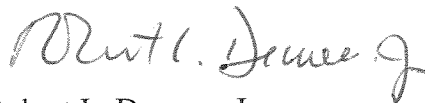
John Nerden and Keith Dalton report to Danny G. Cote, Bay State's General Manager. Edward Collins works with Mr. Cote, although he does not report to Mr. Cote. Mr. Cote is responsible for the overall operation and management of the Company's distribution system and has overall responsibility for the Company's steel infrastructure replacement program and related corrosion issues. He is scheduled to testify in this proceeding on July 6 and July 25, and he is the appropriate witness for the Attorney General to question on corrosion and the Company's

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infrastructure replacement program. Simply because an employee's name appears in materials submitted in response to an information request, is not a sufficient ground to require that individual testify in this proceeding.

For the reasons set forth above, Bay State objects to the Attorney General's request to take depositions of the employees he has identified.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Robert L. Dewees, Jr.", written in dark ink.

Robert L. Dewees, Jr.

cc: Caroline O'Brien Bulger, Esq., Hearing Officer
A. John Sullivan, DTE (7 copies)
Andreas Thanos, Assistant Director, Gas Division)
Alexander J. Cochis, Assistant Attorney General (4 copies)
Paul R. Osborne, Assistant Director, Rates and Revenue Requirements Division
Service List